GALLAGHER & KENNEDY, P.A. 2575 E. CAMELBACK ROAD PHOENIX, ARIZONA 85016-9225 (602) 530-8000 ORIGINAL



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BEFORE THE ARIZONA POWER PLANT AND TRANSPORT 4: 25

LINE SITING COMMITTEE

AZ CORP COMMISSION DOCUMENT CONTROL

IN THE MATTER OF THE APPLICATION OF ALLEGHENY ENERGY SUPPLY COMPANY, LLC FOR A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY FOR CONSTRUCTION OF A 1,080 MW (NOMINAL) GENERATING FACILITY IN SECTION 35, TOWNSHIP 3 NORTH, RANGE 11 WEST IN LA PAZ COUNTY, ARIZONA AND AN ASSOCIATED TRANSMISSION LINE AND SWITCHY ARDS BETWEEN AND IN SECTION 35, TOWNSHIP 3 NORTH, RANGE 11 WEST AND SECTIONS 23-26, TOWNSHIP 3 NORTH, RANGE 11 WEST ALSO IN LA PAZ COUNTY, ARIZONA.

DOCKET NO. L-00000AA-01-0116

CASE NO. 116

MEMORANDUM AND REVISED PROPOSED CERTIFICATE OF ENVIRONMENTAL

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As requested at the conclusion of the last hearing day, attached as Exhibit A is a revised proposed Certificate of Environmental Compatibility (the "Revised Certificate"). In addition to addressing other issues, Allegheny has reviewed prior CECs in the Toltec and Bowie cases as the Chair suggested and has incorporated changes where appropriate. Allegheny reserves the right to propose further changes to the Revised Certificate based on hearing or other developments.

Major changes in the attached Revised Certificate from previous filings are identified as follows:

- A new condition 4 has been added to limit groundwater withdrawals to the levels specified in the statute for the Harquahala INA.
- Condition 1 has been modified in certain respects consistent with the similar condition in the Bowie CEC.
- New text has been added at page 3 and a new sentence added to condition
 25 to: (a) authorize two alternate routes for the short transmission line and

associated interconnection switchyard, (b) include a best efforts commitment to construct along one of the alternates¹ and (c) use monopoles for the transmission line.

- A "local employees" sentence has been added to condition 19 based on the Bowie CEC.
- Condition 27 includes a sentence pertaining to wildlife protection similar to the Toltec and Bowie CECs.
- A new condition 39 pertains to Project decommissioning similar to the Toltec and Bowie CECs.

Allegheny and Staff were unable to meet prior to the filing date, but have a meeting scheduled for January 11, 2002. The parties have previously agreed on virtually all conditions, but are working to resolve certain issues pertaining to conditions 11 and 12. The Revised Certificate contains conditions 11 and 12 which Allegheny proposes and has suggested for Staff's consideration.

Allegheny received from the Unions ten proposed conditions on January 4, 2002 and discussed them with the Unions prior to this filing. Allegheny is unable to agree to the proposed Union conditions for, among others, the following reasons:

- The Unions have suggested dry or alternatively parallel wet-dry cooling. The record in this matter simply does not support the need at this location for the greatly increased expense, significant performance penalties and increased air emissions associated with these alternate technologies. The record does support Allegheny's lawful use of the water for this beneficial use and the user's almost non-existent impacts on this acquifer. Allegheny has also committed to AMA water conservation requirements even though the Project is not located in an AMA (condition 1.c) and a recharge contribution of 30,000 acre feet (condition 3).
- The Unions suggest an expensive zero liquid discharge crystallizer system to minimize wildlife impacts. However, its witness Dr. Terrill, once advised of the ponds' design and lining, admitted that any wildlife impacts would be substantially reduced (HRTR, pp. 939-941). Evaporation ponds are common throughout Arizona and have posed no problem (HRTR, pp.

¹ The County has expressed a preference for the Avenue 75 East alignment.

929-930). Finally, conditions 26 and 27 have been developed in consultation with the Arizona Game and Fish Department which has indicated its approval (Dec. 14, 2001 letter to Ms. Woodall from Mr. Kennedy).

The Unions suggest an on-site urea-to-ammonia generation system.

- The Unions suggest an on-site, urea-to-ammonia generation system. The technology is unproven--particularly for combined cycle units such as the one proposed here²--and the record does not support its need. In fact, the Unions suggested use of aqueous ammonia as proposed by Allegheny as a mitigation measure in the Big Sandy case (HRTR, pp. 998-999).
- The Unions suggest use of "California BACT." The phrasing of their condition is virtually identical to condition 1.b in the Revised Certificate which specifies BACT as determined by the Arizona Department of Environmental Quality. The evidence in this record demonstrates Arizona employs its own, case-by-case BACT process and local law should and must apply.
- Rather than the 100 KW solar array proposed by Allegheny, the Unions suggest a 1000 KW array. This would be considerably more expensive, occupy approximately 100 acres of land which is not available and would exceed the Project's direct current requirements.
- The Unions suggest Allegheny commit \$25 million above the sums which will be expended by Allegheny to finance improvements to Arizona's transmission system. As set forth in condition 12, Allegheny has already committed to financing more than \$25 million in Arizona transmission enhancements--a sum far in excess of the contribution made by any applicant to date. \$25 million more is unreasonable and unwarranted.
- Finally, the Unions have suggested certain modifications to conditions 9, 11, 17 and 18 pertaining generally to interconnection, purchase and cost issues. Allegheny has drafted its conditions consistent with prior CEC provisions and after consultation with Staff. The Unions' proposals are not supported by the record, are unduly burdensome and confusing and may conflict with present or future regulatory and governing interconnection and operational standards.

² HRTR, pp. 992-993.

Allegheny would request that the Committee approve the Revised Certificate attached as Exhibit A. RESPECTFULLY SUBMITTED this 10 day of January, 2002. 3 GALLAGHER & KENNEDY, P.A. 5 By Michael M. Shant Michael M. Grant Todd C. Wiley 2575 East Camelback Road 8 Phoenix, Arizona 85016-9225 Attorneys for Allegheny Energy Supply 9 Company, LLC 10 11 Original and 25 copies filed this day of January, 2002, with: 12 **Docket Control** 13 | Arizona Corporation Commission 1200 West Washington 14 Phoenix, Arizona 85007 15 Copy of the foregoing emailed and mailed 16 this wife day of January, 2002, to: 17 Laurie Woodall, Esq. laurie.woodall@ag.state.az.us 18 Office of the Attorney General 1275 West Washington 19 Phoenix, Arizona 85007-2997 20 Jason Gellman, Esq. jgellman@cc.state.az.us 21 Legal Division Arizona Corporation Commission 22 | 1200 West Washington Phoenix, Arizona 85007

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GALLAGHER & KENNEDY, P.A. 2575 E. CAMELBACK ROAD PHOENIX, ARIZONA 85016-9225 (602) 530-8000

BEFORE THE ARIZONA POWER PLANT AND TRANSMISSION LINE SITING COMMITTEE

IN THE MATTER OF THE APPLICATION OF ALLEGHENY ENERGY SUPPLY COMPANY, LLC FOR A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY FOR CONSTRUCTION OF A 1,080 MW (NOMINAL) GENERATING FACILITY IN SECTION 35, TOWNSHIP 3 NORTH, RANGE 11 WEST IN LA PAZ COUNTY, ARIZONA AND AN ASSOCIATED TRANSMISSION LINE AND SWITCHYARDS BETWEEN AND IN SECTION 35, TOWNSHIP 3 NORTH, RANGE 11 WEST AND SECTIONS 23-26, TOWNSHIP 3 NORTH, RANGE 11 WEST ALSO IN LA PAZ COUNTY, ARIZONA.

DOCKET NO. L-00000AA-01-0116
CASE NO. 116

CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY

Pursuant to notice given as provided by law, the Arizona Power Plant and Transmission Line Siting Committee (the "Committee") held public hearings in Parker and Phoenix, Arizona, on September 4, 2001, November 13-14, 2001, December 13-14, 2001, and January 15-16, 2002, in conformance with the requirements of Ariz. Rev. Stat. § 40-360, et. seq., for the purpose of receiving public comment and evidence and deliberating on the application of Allegheny Energy Supply Company, LLC, or its assignees ("Allegheny" or "Applicant"), for a Certificate of Environmental Compatibility ("Certificate") authorizing construction of a 1080 MW (nominal) generating facility and an associated transmission line and switchyards in La Paz County, Arizona (the "Project"), all as more particularly described and set forth in the Application (the "Application").

The following members and designees of members of the Committee were present on one or more of the hearing days:

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Laurie Woodall Chairman, Designee for Arizona Attorney General, Janet Napolitano Richard Tobin Department of Environmental Quality Department of Water Resources Gregg Houtz Ray Williamson Arizona Corporation Commission Mark McWhirter Department of Commerce Michael Palmer Appointed Member Jeff McGuire Appointed Member Appointed Member Wavne Smith Sandie Smith Appointed Member Michael Whalen Appointed Member

Applicant was represented by Michael M. Grant and Todd C. Wiley of Gallagher & Kennedy, P.A. Arizona Corporation Commission Utilities Division Staff ("Staff") was represented by Christopher C. Kempley and Jason D. Gellman. Intervenor Arizona Unions for Reliable Energy ("Unions") was represented by James D. Vieregg of Morrison & Hecker, L.L.P. and Mark R. Wolfe of Adams, Broadwell, Joseph & Cardozo. La Paz County, by its County Attorney R. Glenn Buckelew, filed a notice of limited appearance in support of the grant of Allegheny's Application.

At the conclusion of the hearing, after consideration of the Application, the evidence and the exhibits presented, the comments of the public, the legal requirements of Ariz.

Rev. Stat. §§ 40-360 to 40-360.13 and in accordance with A.A.C. R14-3-213, upon motion duly made and seconded, the Committee voted to make the following findings and to grant Allegheny the following Certificate of Environmental Compatibility (Case No. 116):

The Committee finds that the record contains substantial evidence regarding the need for an adequate, economical and reliable supply of electric power and how the Project would contribute towards satisfaction of such need without causing material adverse impact to the environment.

Applicant and its assignees are granted a Certificate authorizing the construction

of a 1,080 MW (nominal) electric generating plant as more particularly described in Section 4(a)(i) of the Application and an associated 500 kv transmission line and switchyards as more particularly described in Section 4(b)(i) of the Application and Exhibit G-7. In addition to the Avenue 75 East alignment, Applicant also is granted two alternative routes for the associated 500 kv transmission line and interconnection switchyard to and along the section lines one mile east and one mile west of Avenue 75 East to the point of interconnection with the Devers-Palo Verde transmission line. Applicant shall use its best efforts to construct the associated 500 kv transmission line along either of those alternative routes.

This Certificate is granted upon the following conditions:

- 1. Applicant and its assignees will comply with all existing applicable air and water pollution control standards and regulations, and with all existing applicable ordinances, master plans and regulations of the state of Arizona, the county of La Paz, the United States and any other governmental entities having jurisdiction, including but not limited to the following:
 - a. all zoning stipulations and conditions, including but not limited to any landscaping and dust control requirements and/or approvals;
 - b. all applicable air quality control standards, approvals, permit conditions and requirements of the Arizona Department of Environmental Quality ("ADEQ") and/or other State or Federal agencies having jurisdiction, and the Applicant shall install and operate selective catalytic reduction and catalytic oxidation technology at the level determined by the ADEQ. The Applicant shall operate the Project so as to meet a 2.5 ppm NOx emissions level, within the parameters established in the Title V and PSD air quality permits issued by ADEQ. Applicant shall install and operate catalytic oxidation technology that will produce carbon monoxide ("CO") and volatile organic compound ("VOC") emission rates determined as current best available control technology ("BACT") by ADEQ;
 - c. all applicable water use and/or disposal requirements of the Arizona Department of Water Resources ("ADWR"), Section 6-503 of ADWR's Third Management Plan and the applicable

ADEQ water use and discharge regulations;

- d. all applicable regulations and permits governing transportation, storage and handling of petroleum products and chemicals.
- 2. Allegheny shall construct a 100 KW solar photovoltaic array for use in conjunction with the Project's electricity use requirements. Allegheny will also participate in future solar workshops conducted by the Commission.
- delivery facilities, Allegheny will acquire over the next 30 years directly, through another or by contract with the Arizona Water Banking Authority ("AWBA") an aggregate amount of 30,000 acre feet of CAP water or that aggregate amount of water which may be acquired with \$3 million, whichever is less. The water acquired is intended to be recharged at the Vidler Recharge Facility ("Vidler"), but may be recharged elsewhere by the Applicant or AWBA. Water recharged shall not be subject to withdrawal by Applicant. Allegheny may also meet all or a portion of its obligation hereunder by acquiring on another person or entity's behalf CAP water to be used in lieu of groundwater which would have been withdrawn and used by such person or entity. If Allegheny has used or recharged CAP water in relation to the Project's water needs, the amount of such use or recharge shall be treated as a credit against Applicant's obligation under this condition.
- 4. Applicant may withdraw groundwater for electrical generation and related uses in amounts as specified in A.R.S. § 45-440.
- 5. In consultation with the Arizona Department of Water Resources,
 Allegheny will develop a monitoring program of monument inspection and information
 gathering from agencies with infrastructure or jurisdiction near the plant site concerning
 subsidence. The data gathered pursuant to the monitoring program shall be regularly reported to

the Department and Commission.

- 6. In the year following the commencement of groundwater withdrawals in relation to the Project, Applicant shall submit annual reports to the Arizona Department of Water Resources pursuant to A.R.S. 45-437.C.1 reporting the quantity of groundwater withdrawn and the Notice(s) of Authority appurtenant thereto.
- 7. Authorization to construct the facility will expire five years from the date the Certificate is approved by the Arizona Corporation Commission unless construction is completed to the point that the facility is capable of operating at its rated capacity by that time; provided, however, that prior to such expiration the facility owner may request that the Arizona Corporation Commission extend this time limitation.
- 8. Applicant shall initially connect the 500 kV Plant Switchyard to the 500 kV Transmission Grid Interconnection Switchyard with a single 500 kV transmission line, but shall allocate spaces in the Plant Switchyard and shall direct SCE to allocate spaces in the Transmission Grid Interconnection Switchyard for (i) a second 500 kV Transmission line should future reliability studies indicate that such addition is necessary to maintain reliability or (ii) a second Devers/Palo Verde transmission line.
- 9. Applicant's plant interconnection must satisfy the Western Systems
 Coordinating Council's ("WSCC") single contingency outage criteria (N-1) and all applicable
 local utility planning criteria without reliance on remedial action such as, but not limited to,
 reducing generator output, reducing generator unit tripping or load shedding.
 - 10. The Applicant's plant switchyard shall utilize a breaker and a half scheme.
- 11. Prior to construction of any facilities, Allegheny shall provide to the Commission the system impact study and the facilities study performed by Southern California

Edison regarding delivery of the full output of the Project to its intended markets (the "SCE Technical Studies"). The SCE Technical Studies shall be prepared in accordance with the rules and regulations governing such interconnections as established by the Transmission System Owner and Operator, in this case the Palo Verde-Devers Transmission Line owned by SCE and operated by CAISO. The SCE Technical Studies shall include a power flow and stability analysis report and shall identify transmission system upgrades or capacity improvements such that the Project will not compromise the reliable operation of the interconnected transmission system in accordance with SCE, CAISO and WSCC requirements. Applicant shall make all arrangements necessary with SCE and CAISO to implement the necessary transmission system upgrades or capacity improvements as documented in the final interconnection agreements. Applicant shall provide the Commission with copies of the transmission interconnection and transmission service agreement(s) it ultimately enters into with SCE or any transmission provider(s) with whom it is interconnecting, within 30 days of execution of such agreement(s). Prior to commencing operation of the Project, transmission facilities improvements, as identified in the SCE Technical studies, shall have been completed.

improvements that will be identified and required in the SCE Technical studies and the final interconnection agreement(s) may cost up to \$25,000,000 and will result in substantial transmission capacity increases out of the Palo Verde hub. However, in the event that these transmission capacity increases at the Palo Verde hub are not equivalent to 1080 MW, Applicant will work with the Commission Staff and Transmission Owners to determine the best method for making up to an additional \$2,500,000 contribution towards additional upgrading of the transmission capacity out of the Palo Verde hub. Applicant will use commercially reasonable

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efforts to assure that such additional upgrades are completed before the Project commences commercial operation.

- 13. Applicant will become and remain a member of WSCC, or its successor, and file an executed copy of its WSCC Reliability Management System (RMS) Generator Agreement with the Commission. Membership by an affiliate of Applicant satisfies this condition only if Applicant is bound by the affiliate's WSCC membership.
- 14. Applicant shall apply to become and, if accepted, thereafter remain a member of the Southwest Reserve Sharing Group or its successor, thereby making its units available for reserve sharing purposes, subject to competitive pricing.
- 15. Applicant shall offer for Ancillary Services, in order to comply with WSCC RMS requirements, a total of up to 10% of its total plant capacity to (A) the local Control Area with which it is interconnected and (B) Arizona's regional ancillary service market, (i) once a Regional Transmission Organization (RTO) is declared operational by FERC order, and (ii) until such time that an RTO is so declared, to a regional reserve sharing pool.
- 16. Within 30 days of the Commission decision authorizing construction of this project, Applicant shall erect and maintain at the site a sign of not less than 4 feet by 8 feet dimensions, advising:
 - a. That the site has been approved for the construction of a 1,080 MW (nominal) generating facility;
 - b. The expected date of completion of the facility; and
 - c. Phone number for public information regarding the project.

In the event that the Project requests an extension of the term of the certificate prior to completion of the construction, Applicant shall use reasonable means to directly notify all landowners and

residents within a one-mile radius of the Project of the time and place of the proceeding in which the Commission shall consider such request for extension. Applicant shall also provide notice of such extension to La Paz County.

- 17. Applicant shall first offer wholesale power purchase opportunities to credit-worthy Arizona load-serving entities and to credit-worthy marketers providing service to those Arizona load-serving entities.
- 18. Pursuant to applicable Federal Energy Regulatory Commission ("FERC") regulations, Applicant shall not knowingly withhold its capacity from the market for reasons other than a forced outage or pre-announced planned outage. Allegheny shall not be required to operate its Project at a loss.
- 19. In connection with the construction of the project, Applicant shall use commercially reasonable efforts, where feasible, to give due consideration to use of qualified Arizona contractors. In addition, Allegheny shall encourage the hiring of qualified local employees in connection with construction and operation of the Project.
- 20. Applicant shall continue to participate in good faith in state and regional transmission study forums to identify and encourage expedient implementation of transmission enhancements, including transmission cost participation as appropriate, to reliably deliver power from the Project throughout the WSCC grid in a reliable manner.
- 21. Applicant shall participate in good faith in state and regional workshops and other assessments of the interstate pipeline infrastructure.
- 22. Applicant shall pursue all necessary steps to ensure a reliable supply and delivery of natural gas for the Project.
 - 23. Within five days of Commission approval of this CEC, Applicant shall

request in writing that El Paso Natural Gas Company ("El Paso") provide Applicant with a written report describing the operational integrity of El Paso's Southern System facilities from mileposts 660-670. Such request shall include:

- A request for information regarding inspection, replacement and/or repairs performed on this segment of El Paso's pipeline facilities since 1996 and those planned through 2006; and
- An assessment of subsidence impacts on the integrity of this segment of pipeline over its full cycle, together with any mitigation steps taken to date or planned in the future.

Applicant shall file El Paso's response under this docket with the Commission's Docket Control. Should El Paso not respond within thirty (30) days, Applicant shall docket a copy of Applicant's request with an advisory of El Paso's failure to respond. In either event, Applicant's responsibility hereunder shall terminate once it has filed El Paso's response or Applicant's advisory of El Paso's failure to respond.

- 24. Applicant shall operate the Project so that during normal operations the Project will not exceed (i) U.S. Department of Housing and Urban Development ("HUD") or Federal Transit Administration ("FTA") residential noise guidelines or (ii) Occupational Safety and Health Administration ("OSHA") Worker Safety Noise Standards.
- 25. Applicant will use low profile structures and stacks, non-reflective and/or neutral colors on surface materials and low intensity directive/shielded lighting fixtures to the extent feasible for the Project. Applicant shall use monopoles for the associated 500 kv transmission line to the point of interconnection with the Devers-Palo Verde transmission line.
 - 26. Allegheny will fence the generating facility and evaporation ponds to

minimize effects of plant operations on terrestrial wildlife and will keep the berms surrounding the evaporation ponds clear of vegetation to limit pond attractiveness to birds.

- 27. In consultation with the Arizona Game & Fish Department, Applicant will develop a monitoring and reporting plan for the evaporation ponds. The plan will include the type and frequency of monitoring and reporting to the Game & Fish Department and the U.S. Fish and Wildlife Service. Should any issues arise as a result of the monitoring and reporting plan, Applicant shall work with the United States Fish and Wildlife Service and the Arizona Game and Fish Department to develop screening or other methods to protect wildlife from harm at the Project's evaporation ponds.
- 28. Allegheny will continue cactus ferruginous pygmy owl surveys through the Spring of 2002, based on established protocol. If survey results are positive, the U.S. Fish and Wildlife Service and Arizona Department of Game and Fish will be contacted immediately for further consultation.
- 29. Allegheny will retain a qualified biologist to monitor all ground clearing/disturbing construction activities. The biological monitor will be responsible for ensuring proper actions are taken if a special status species is encountered (e.g., relocation of a Sonoran desert tortoise).
- 30. Applicant will salvage mesquite, ironwood, saguaro and palo verde trees removed during project construction activities and use the vegetation for reclamation in or near its original location and/or landscaping around the plant site.
- 31. Allegheny will retain an Arizona registered landscape architect to develop a landscape plan for the perimeter of the generating facility. The landscape plan will use native or other low water use plant materials. The Applicant will continue to consult with La Paz

County regarding the landscape plan.

- 32. Allegheny will use a directional drilling process to bore under Centennial Wash in constructing the gas pipeline to minimize potential impacts to the mesquite bosque associated with the wash.
- 33. The Applicant will continue to consult with La Paz County in relation to its comprehensive planning process to develop appropriate zoning and use classifications for the area surrounding the Project.
- 34. Allegheny will use its best efforts to avoid the two identified cultural resource sites. If Sites AZ S:7:48 and 49 (ASM) cannot be avoided by ground disturbing activities, the Applicant will continue to consult with the State Historic Preservation Office to resolve any negative impacts which usually entails preparing and implementing a data recovery research design and work plan.
- 35. If a federal agency determines that all or part of the Project represents a federal undertaking subject to review under the National Historic Preservation Act, Allegheny will participate as a consulting party in the federal compliance process (i.e., 36 C.F.R. 800) to reach a finding of effect and to resolve adverse effects, if any.
- 36. Should cultural features and/or deposits be encountered during ground disturbing activities, Allegheny will comply with A.R.S. § 41-844, which requires that work cease in the immediate area of the discovery and that the Director of the Arizona State Museum be notified promptly.
- 37. If human remains or funerary objects are encountered during the course of any ground disturbing activities related to the development of the subject property, Applicant shall cease work and notify the Director of the Arizona State Museum in accordance with Ariz.

Rev. Stat. § 41-865. 38. Allegheny will retain a qualified archaeologist to monitor ground clearing/disturbing construction activities and to appropriately instruct workers on detection and avoidance of cultural resource sites. Applicant shall prepare a plan for shutdown, decommissioning and 39. cleanup of the plant site which shall be filed with the Commission's Docket Control within one year of beginning construction. In that regard, the Committee recommends that Applicant work with La Paz County and/or any other local governing body with jurisdiction over the plant site to ensure that such plan is reasonable, and is followed or amended as necessary. GRANTED this ______ day of _______, 2002. ARIZONA POWER PLANT AND TRANSMISSION LINE SITING COMMITTEE Laurie Woodall, Chairwoman 12921-0004/947199 v8